WDFW responses to public comments received during the public review of the Klickitat Wildlife Area Management Plan draft under the State Environmental Policy Act (SEPA) from May 17, 2016 until June 20, 2016.

#	Comment	WDFW Response
1.	Map 6 (Goldendale Hatchery Unit), page 16 mislabels the main stem of	The map has been corrected.
	Spring Creek as Swale Creek.	
	Lenny Anderson	
2.	Figure 1, page 21, Klickitat River Stream Flow data only goes back to 2008.	Comment noted. The USGS site only provided data back to
	I would love for it to go back another 12 years to 1996, the year of the big	2008.
	flood.	
	Lenny Anderson	
3.	Goal 9, manage wolf livestock conflicts to minimize livestock losses, while	Washington state's wolf population continues to grow and
	not impacting the recovery of a sustainable wolf population, do you	expand. At the time this plan is written, there have not been
	expect this to occur in the next 10 years?	any recent recordings of wolves on the Klickitat WLA.
	Lenny Anderson	Objective 9A states "follow statewide guidelines for wolf
		management. Once a pack is established around the wildlife
		area, evaluate adaptive management as per statewide
		planning". The wolf plan is available on the Washington
		Department of Fish and Wildlife (WDFW) website -
1	Linday Decreation and Dublic use the plan mentions the Klishitet Tuell but	http://wdfw.wa.gov/news/mar1416b/
4.	Under Recreation and Public use, the plan mentions the Klickitat Trail, but no mention is made of the Columbia Land Trust's Haul Road. Is that	The Haul Road is a private road, owned by the Columbia Land Trust. Private land holdings are not covered under the
	intended? I read on their website that the restoration work has been	Klickitat Wildlife Area Management Plan, which only applies to
	completed and the road is now open for public use, expect for fire	lands administered by WDFW. The Columbia Land Trust is a
	closures. There is no mention of public access in the plan.	separate entity and they have management oversight of their
	Lenny Anderson	lands.
5.	The wildlife area plan is very informative and based on sound WDFW	The Klickitat Wildlife Area staff work with other WDFW
	policy, goals and objectives. A plan very well done but cannot be	personnel to address specific needs as they arise, including
	enforced and followed given the fact that there are just two FTEs to	campground safety issues, forest management needs, law
	manage, maintain and protect this gem of a wildlife area.	enforcement, fish population and habitat assessment, road
	Rob Kavanaugh	maintenance, rangeland quality monitoring, identification of
	-	cultural resources needing protection, and safety assurance of
		facilities at headquarters. Additionally, Wildlife Area staff
		partner with other agencies for assistance with fire protection,

		law enforcement, coordination of recreation management, proper management of natural springs near the Klickitat River, and also receive much-valued help from volunteers on a variety of projects that include documentation of rare plant populations, removal of derelict fencing, monitoring water levels in key ponds, chipping wood debris from fire hazard reduction projects, and clearing obstructions from roads. Some tasks are accomplished by hiring independent contractors. By utilizing as many other available resources as possible, WDFW maximizes the benefit to the public's interest in the Wildlife Area. Agency wildlife area staff welcomes new volunteers, if interested contact the Klickitat Wildlife Area Manager.
6.	Grazing should continue on the wildlife area. Danny Frey	WDFW recognizes the value of working landscapes, and areas that currently have managed grazing are expected to continue so long as habitat management objectives area met and the permit holders remain engaged. The wildlife area currently has three grazing permits described on page 48 of the plan.
7.	Satisfied with the current management. Does not want WDFW to sell off any land. The boat ramp washed away last winter (Stinson Flats) should be replaced. In the meantime could boaters launch from a primitive putin at Stinson Flats? Ken Dragoo	WDFW is not considering selling or exchanging land in Klickitat County. The boat ramp at Stinson Flats Campground will be replaced; however this project is added to list of projects already in queue. WDFW is open to consideration of a primitive put-in at Stinson Flats in order to maintain boater access to the river. Please contact the wildlife area manager for more information.
8.	Many of my friends and I use the KWA regularly. Of all of us, there are only two hunters, the rest are native plant enthusiasts and hikers. The ratio of non-consumptive users to hunters is at least 8 to 1, in my experience. I would therefore like to see the KWA used with this ratio in mind. I especially feel that turkeys and grazing are not compatible with the ratio of users that I am aware of. With this in mind I would like to see a reduction of the number of turkeys and grazing permits. Turkeys especially, as an introduced species are in direct conflict with the state threatened Gray Squirrels as well as the deer	Supporters of the Klickitat Wildlife Area have traditionally been hunters and fishermen; however we recognize that a broader range of interests are now being served by WDFW's lands. In general, the Klickitat Wildlife Area seeks to maintain a variety of habitat types in order to attract a rich array of wildlife and satisfy a diverse group of supporters. WDFW also desires to have a place in landscape-level habitat management, which involves many private and public ownerships. Our grazing policies and management practices

which are also a native species. I believe turkeys should be considered a noxious species and eliminated on the KWA.

I would also like to see grazing permits eliminated, as stock are not compatible with native plant species, some of which are rare. Stock eat native species and introduce non-native species through their feces. And the non-consumptive users of the KWA must very greatly outnumber the ranchers who graze their animals there.

After all, it is a "Wildlife Area", not an introduced species area or grazing area.

Carl T. Anderson

are designed to minimize or prevent negative impacts to sensitive species, whether fish, wildlife, or rare plants. Grazing permits are not offered on areas where rare plants or important limited habitats could be at risk. The largest scale grazing permit on the Klickitat Wildlife Area is part of a coordinated resource management plan involving three landowners, two of which are private. This coordinated resource management plan is intended to maintain habitat quality on private lands for deer by matching the timing of grazing with plant growth at different rangeland elevations on Grayback Mountain. While WDFW is not looking to expand grazing on the Wildlife Area, conservatively managed grazing on lands that have a history of such use is expected to continue provided that habitat management objectives are met and permit holders are interested. Grazing permits that fail to attract interest from prospective permittees may be phased out.

Regarding turkeys, WDFW recognizes that turkeys are a nonnative species that were introduced in Washington with support from our hunting constituents. WDFW has concerns about overpopulation of the turkey population and its potential impacts to other resources. The decision was made to not do any future transplants or movements of turkeys within or into Klickitat County. In addition, we are considering increasing the number of days during the fall turkey hunting season as a way of keeping the population in balance.

Impacts to desirable wildlife species are taken seriously and considered in making habitat management decisions. Weeds are very much a concern. Grazing at the allowed level of use does affect plant communities, but some native species like Hooker's balsamroot are making a comeback within a grazing permit area. Also, acorn woodpeckers, which are rare in

9.	Page 48, clarify which actions will actually be occurring on Bureau of Land Management (BLM) lands in the two units. Attach BLM MOU in the	Washington, have established a permanent territory within a grazed area, and western bluebirds are commonly observed there as well. Western gray squirrels are routinely seen in the forest near a water trough. The Memorandum of Understanding between WDFW and BLM relating to administration and management of BLM lands
	appendix? BLM	by WDFW is expected to undergo a major update in 2016. The MOU of 1964 does not address current legal conditions regarding BLM lands, or all of the potential contemporary uses and concerns. These matters will be addressed as the new MOU is developed. A copy of the current MOU can be obtained by contacting the wildlife area manager.
10.	Page 64, goal 11, clarify which actions will actually be occurring on BLM lands in the two units.	Established campgrounds in this area are Leidl Park, Stinson Flats, and Mineral Springs. WDFW is not proposing any new campground developments. Visitors will be contacted and
	Would additional "established campgrounds" be developed? How would	educated regarding the larger objective (see objective 11 A.)
	dispersed camping areas (such as BLM areas near river on Soda Springs unit) be managed or reclaimed?	We are working toward by limiting recreation to day use along that segment of the river, and signs will only be posted on WDFW lands.
	Although this plan can close WDFW lands to dispersed camping it will not close BLM lands. BLM	
11.	Page 65, goal 11, work with BLM to identify possible locations for low impact shooting if the desired location will be on BLM managed lands. In addition working with the BLM on identifying where shooting is currently occurring. BLM	WDFW is unaware of target shooting activity on BLM lands within the Klickitat Wildlife Area. There is no compatible location for low impact shooting to take place on BLM lands associated with the KWA.
12.	It may be appropriate to mention that BLM has found the segment of the Klickitat River in the northern most parcel of BLM in the Soda Springs eligible for inclusion into the National Wild and Scenic River system. BLM is analyzing alternatives for management of this section under the draft Resource Management Plan (currently under development). BLM	This is recommended for inclusion in the updated Memorandum of Understanding between WDFW and BLM regarding management of BLM parcels within the Klickitat Wildlife Area. If the updated MOU leads to revised management actions on the WLA, the plan will be updated to reflect these. A review of plan progress and accomplishments occurs every two years.

	Page 70, weed control; document discusses weed control at developed access sites. Weed control also should occur at popular dispersed recreation sites along the river. Please coordinate weed treatment activities on BLM managed lands with BLM. BLM	Comment is noted. No popular dispersed recreation sites located on BLM lands are presently known.
13.	Page 37, clarify that BLM-managed lands in this analysis area are managed under an existing BLM Resource Management Plan, and subject to federal laws including NEPA, ESA, cult 106, etc. For additional information please reference previous letter regarding the need to update the MOU between the BLM and WDFW. BLM	Text added on page 48.
14.	Page 38, remove BLM-managed acres from this table or clarify in footnote that BLM-managed lands are managed under an existing BLM Resource Management Plan and subject to federal laws including NEPA, ESA, cult 106, etc. For additional information please reference previous letter regarding the need to update the MOU between the BLM and WDFW. BLM	Text added on page 48.
15.	Update management plan to include references to update MOU with BLM and the division of resource management on BLM managed lands. BLM	Text added page 48.
16.	Page 10 states that management on adjacent private lands has shown increases in WGS populations, based on implementation of WGS guidelines. This is a good example of adaptive management, and I know WDFW worked with the landowner in implementing WGS guidelines. Jim White	Thank you for your comment.
17.	Page 11 mentions the Audubon "Sun and Sage" Loop, part of the Washington State Birding Trail. A good addition, missing in earlier drafts. Jim White	Thank you for your comment.
18.	The section on Forest Management (page 37) outlines a process by which forests will be managed, and refers to the Forest Plan for more detail. This is encouraging, as the 2006 plan merely said things would be assessed. I also learned at the Goldendale meeting that an initial project is now being planned. I would note that. It shows that progress is already	See response #21

	being made (more about this below under the Forest Plan).	
	Jim White	
19.	Forest Management Plan I was encouraged at the Goldendale meeting to find that projects are already being planned. I would note this in the Forest Plan. Before the meeting, my reading of the Forest plan frustrated me, in that very little detail was shown, and it was not clear when anything would get started. I would note that work has begun, and show an actual date for implementation of the first project. Jim White	Language was added to page 25 of the plan referring to this year's project and the timing thereof. See language inserted into the forest management plan #2.
20.	Forest Plan - Figure 3 incorrectly referred to as Figure 6 on page 11 - Page 9, heading should probably be "Successional Classes" instead of "Succession Classes" - Page 10, last paragraph, should say "facilitate" not "facility". Jim White	Text edited under the respective page numbers of the forest plan.
21.	Forest Management Plan It may be helpful to note that I (Jim White) was a temporary employee with WDFW when I did the mentioned inventory work. At the meeting, Forester Rod Pfeifle discussed his silviculture prescription for stand management, including a bit about tree spacing objectives, species preference, and variable density of the thinning treatments proposed ("skips" and "gaps" with some areas more heavily thinned, other small areas not thinned). This fits very closely with work I did on the Conboy National Wildlife Refuge, another prescription with a wildlife management focus. The Forest plan itself mentions none of this. In one place, on page 14 (under "Urban Interface Management") there is a mention of a goal of thinning to 20-25 trees per acre. Nowhere else in the document is this mentioned, making it very confusing. I would add a short discussion of the proposed treatments, as Rod discussed at the meeting. Otherwise, it leaves the reader with no clue about what exactly is proposed, other than general statements about restoring historical conditions.	Moving forward, the goal will be to complete one forest restoration/thinning project every year during the next 10 year planning cycle. The first of these projects is currently in the layout phase with an anticipated start date in mid-October. Each project will have its own unique prescription based upon wildlife habitat needs and stand conditions. However, all projects will share the following common goals: Reduce stocking levels and manipulate species composition consistent with mid to late seral stand conditions Maintain and eventually improve habitat for the western gray squirrel Maintain and improve eventually improve habitat for other wildlife species Improve forest health Treat urban interface areas Restore Oregon white oak stands

	Jim White	To accomplish these goals, most projects will closely follow the Individual, Clumps and Openings (ICO) thinning strategy found in "The ICO Approach to Quantifying and Restoring Forest Spatial Pattern: Implementation Guide." In essence, this strategy will create a mosaic generally considered to be prevalent in dry conifer forest types with a history of frequent fire. The preferred leave tree species for most projects would be ponderosa pine. Oak thickets will remain intact with encroaching conifer removed. Leave tree densities will generally range between 20 (average spacing of 45') and 40 (average spacing of 30') trees per acre post treatment. This information has been added to the Klickitat Wildlife Area Forest Plan (Appendix B.).
22.	Page 19 Fisher Hill Unit: "This segment of the river flow through a narrow channel that was fished by members of the Yakima Indian Nation and remains an important fishing site today." The phrasing seems odd, "was" implies past tense. We recommend rephrasing, for example, "This segment of the river flows through a narrow channel that has been fished by members of the Yakama Nation for centuries and remains an important fishing site today." Please be advised that the Yakama Nation has not used the word "Indian" in its name for years, and therefore we would request all references be to "Yakama Nation". Yakama Nation	Text revised page 19.
23.	Page 20, last sentence of the page — "The West Fork Klickitat provides most of the summer flow in the Klickitat River (J Byrne, pers comm)." This assertion should be rooted in data rather than citing personal communication. Data from the USGS gauge above the West Fork (http://waterdata.usgs.gov/usa/nwis/uv?14107000) could support such statement. On the next page, streamflow data from the gauge at Pitt is cited. Yakama Nation	Text revised page 20.

24.	Page 29 – A paragraph on fish passage states that "the most significant	Text revised page 29.
	natural fish passage barriers include: Lyle Falls, Castile Falls, and Little	
	Klickitat River Falls, West Fork Klickitat River Falls, and tributary falls	
	(Outlet Creek, Bowman Creek, Canyon Creek and Blockhouse Creek)." We	
	recommend re-working the phrasing in this paragraph, since the first	
	three falls on the list are only partial barriers to fish passage and the first	
	two have had significant financial investments to improve passage. The	
	next sentence in that paragraph states that bull trout could occupy the	
	upper Klickitat basin if fish passage were improved at Castle Falls. Again,	
	we recommend clarifying this statement, considering the substantial	
	investments to improve passage at Castile Falls were completed in 2005.	
	Additionally, the West Fork is likely the stronghold for bull trout in the	
	Klickitat.	
	Yakama Nation	
25.	Page 38- Restoration – no mention is made of the Lower Klickitat	Text will be added in the plan to include this restoration
	Revegetation project, a collaborative between YN and Mid- Columbia	project. In the future, WDFW will continue to collaborate
	Fisheries Enhancement Group, under which some planting occurred at	with the Yakama Nation and the Mid-Columbia Fisheries
	sites on WDFW lands. Goals for this project were to increase bank cover,	Enhancement Group on improving habitat for salmon
	increase woody debris recruitment and increase floodplain roughness.	associated with the Klickitat Wildlife Area along the Klickitat
	Yakama Nation	River.
26.	Page 38 – Restoration – Klickitat River Floodplain Restoration (Haul Road)	Text revised page 38.
	Project – this section makes no mention of the fact that this is a	
	collaborative effort between the YN and Columbia Land Trust or that	
	Bonneville Power Administration has provided funding for the	
	assessment, design and construction oversight.	
	Yakama Nation	
27.	Page 44 – Klickitat Trail – all language makes this appear as a passive use	This section is intended to describe recreational opportunities
	trail; there is little to no mention of the railroad embankment and its	on the Wildlife Area. The Klickitat Trail Rails-To-Trails project
	presence on the landscape for over a century; including significant	is owned and managed by entities other than WDFW, and
	impacts to river habitats and processes.	therefore is not discussed in depth within the Klickitat Wildlife
	Yakama Nation	Area Management Plan.
28.	I support WLA Goal #1 to restore and protect the integrity of priority	Thank you for your comment.
	ecological systems and sites. One of the attractions of visiting the Klickitat	
	Wildlife Area is the mosaic of Oregon white oak woodlands, mixed pine-	

	oak forest, prairie meadows, riparian areas, seasonal wet meadows and	
	stream canyons.	
	Susan Saul	
29.	On the Soda Springs unit, I use the primitive roads as hiking trails. On the Fisher Hill and Swale Creek units, I use the Klickitat Trail as access. I	Thank you for your comment.
	appreciate the seasonal road closures which protect the road surface and	
	adjacent meadows during the time when soils are soft. They also provide	
	undisturbed hiking conditions for birding, wildlife	
	watching, wildflower viewing and photography.	
	Susan Saul	
30.	Regarding Goal 1, I question whether the use of livestock grazing and farming as management tools conflict with goal of maintaining or improving the ecological integrity of priority sites, particularly given the presence of a number of rare plant species on the wildlife area. Certainly, livestock grazing should not be expanded beyond the current terms of the various permits. Similarly, farming should not be expanded beyond the current fields since land conversion to agriculture would conflict with Goal 1. The plan does not state the renewal cycles for the permits so it is unclear how frequently they can be reviewed and adjusted to changing climate conditions.	On the Klickitat Wildlife Area, grazing of livestock and farming activities are confined to areas that have a recent history of these uses. Grazing is managed conservatively to maintain existing plant communities, and in the case of the permit on the Soda Springs Unit, is part of a larger landscape-level plan to distribute utilization of the range at sustainable level over time and space. Each time the permits are due for renewal, they are reviewed for potential impacts and adjustments are made as called for to protect rare plants or animals. Adaptive management is practiced on an as-needed basis, and does not have to wait until a new permit or lease is issued.
	I support Goal 1/objective (C) to develop a plan for protecting critical habitats for rare plants since the plan may clarify any conflicts with current land management.	Farming serves to manage weeds and control erosion as well as produce desirable forage and cover crops for wildlife. When fields that were formerly in agriculture are neglected,
	Susan Saul	the experience on the Wildlife Area is that weeds take over and dominate the plant community for a long time. To convert the fields back to native vegetation would require more resources than the Wildlife Area has available. Goal 1 (C) is intended to protect rare plant populations from current and especially future conflicts with land management
		activities.
31.	I support Goal 4 to maintain and enhance the Oregon white oak	Thank you for your comment.
	woodlands, particularly to assess white oak protection when reviewing	
	livestock grazing permits.	

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the wildlife area is what I would characterize as a somewhat presettlement natural vegetation pattern of bunchgrasses and forbs beneath oaks, pines and doug firs. In many places this is best seen by bare cryptogrammic soil patches between the native grasses which can then host numerous annual plant species, many of which are rare. Because of the lack of weedy species in these bare soil places, the KWA is perhaps the place in Washington (or world in some cases) where these rare plants are most numerous. In addition, the Soda Springs Unit is the only place in Washington where Ceanothus cuneatus (no status yet) is located, and that unit perhaps boasts the largest concentration of mountain lady slippers in Washington. As of June 2016, I should point out that the distribution of rare plants in the wildlife area is only partly known. We found several new subpopulations of rare plants today, and will probably continue to find new populations of rare plants as we hike in the future.

With this in mind, management plans may want to take note of the unique relationship between soil structure and native plants since there are so few such habitats remaining in Washington. In many cases, thinning of tree canopies or shrubs may benefit rare as well as other plant and animal species, but such actions should be done so as not to smother open soils needed by many of the rare annual plants when tree materials are chipped and discarded on the ground. Locations of rare plants and animals should be considered when allowing mechanized equipment in to a wildlife unit for the purpose of thinning. Prescribed burns may also be of benefit, but actions should be taken to prevent a hot burn which would damage the soil and also to prevent the influx of weeds. Grazing should continue to be limited to the existing allotments on Grayback Mt. and not expanded to other areas to prevent damage to the soils and introduction of weeds.

Paul Slichter

Mt. quail should only be introduced if there is previous evidence they existed in the units. I would be leery of increasing the number of non-native turkeys on these units as they damage the soil as they forage and they compete with western gray squirrels, deer and elk for acorns, fungi

the unique communities of plants they support. Known populations of rare plants are protected from negative impacts to the greatest degree practical, and ground-disturbing activities discussed in this management plan are to be mostly limited to areas that have already been affected by such activities or that are less sensitive to disturbance. Seasonal sensitivity to plant damage will also be considered. Potential introduction of weeds is recognized as a threat to native plant communities and warrants active monitoring to detect infestations early. This management plan is intended to foster retention of sensitive habitats, and this comment highlights the importance of careful consideration of the potential consequences of management actions.

The WLA Plan is a place where the presence of rare species should be documented, and updated and monitored over time. We appreciate contributions of findings from volunteers and other members of the public. If new plant species are identified, please contact WLA manager.

See #8 comment.

	and other food sources that help the mammal game animals survive in this area. I see quite a lot of use of the area for fishing and hunting which is fine with me. Paul Slichter	
38	I hear a fair amount of indiscriminate target shooting during non-hunting seasons in the Soda Springs Unit, so it might be good to designate a target shooting area for the safety of hikers and equestrians who visit the area. I'd prefer to see a continuation of winter vehicle closures along roads blocked for wildlife enhancement. Off road vehicles have until now stayed out of sensitive riparian areas and vernally moist swales where many of the rare plants listed in Table D are found, and where water has time to percolate into the soil to provide summer water for trees, shrubs and wildlife. Road closures into such areas may need to occur if it appears that vehicles are damaging them. Paul Slichter	Off road driving by the public is unlawful during all seasons on the Wildlife Area, and better surveillance to identify violators may be sufficient to mitigate this problem without further limiting access to law-abiding visitors. WDFW staff will consider options for location of a target shooting area. If such an area is established, target shooting will be restricted to that area. See comment response #35.